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10 ATTORNEYS FOR PLAINTIFFS

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA

13 CHINA CENTRAL TELEVISION, a China
company; CHINA INTERNATIONAL
14 COMMUNICATIONS CO., LTD., a China
company; TVB HOLDINGS (USA), INC., a
15 California corporation; and DISH
NETWORK L.L.C., a Colorado corporation,
16 Plaintiffs,

17 vs.

18 CREATE NEW TECHNOLOGY (HK)
LIMITED, a Hong Kong company; HUA
19 YANG INTERNATIONAL TECHNOLOGY
LIMITED, a Hong Kong company;
20 SHENZHEN GREATVISION NETWORK
TECHNOLOGY CO. LTD., a China
company; CLUB TVPAD, INC., a California
21 corporation; BENNETT WONG, an
individual; ASHA MEDIA GROUP INC.
22 d/b/a TVPAD.COM, a Florida corporation;
AMIT BHALLA, an individual;
23 NEWTVPAD LTD. COMPANY d/b/a
NEWTVPAD.COM a/k/a TVPAD USA, a
24 Texas corporation; LIANGZHONG ZHOU,
an individual; HONGHUI CHEN d/b/a E-
25 DIGITAL, an individual; JOHN DOE 1 d/b/a
BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
26 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
JOHN DOE 5 d/b/a GANG YUE; JOHN
27 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
d/b/a GANG TAI WU XIA; and JOHN DOES
8-10,

28 Defendants.

Case No.
CV 15-1869 SVW (AJWx)

DECLARATION OF
SEAN M. SULLIVAN IN
SUPPORT OF
PLAINTIFFS' NOTICE
OF NON-OPPOSITION
TO HOLD THIRD
PARTIES AZURE
TECHNOLOGY CO.,
LTD.; ZERO DDOS LLC;
AND CLEARDDOS
TECHNOLOGIES IN
CONTEMPT

Courtroom: 10A
Judge: Hon. Steven V.
Wilson

DECLARATION OF SEAN M. SULLIVAN

I, Sean M. Sullivan, declare as follows:

1. I am an attorney with Davis Wright Tremaine LLP and am one of the attorneys of record for Plaintiffs. I have personal knowledge of the matters herein.

2. On October 17, 2017, copies of the Notice of Motion and Motion to Hold Third Parties Azure Technology Co., LTD, Zero DDOS LLC, and ClearDDOS Technologies In Contempt; Declaration of George Wukoson In Support of Plaintiffs' Motion for Contempt; Declaration of Nicholas Braak In Support of Plaintiffs' Motion for Contempt; and [Proposed] Order Granting Plaintiffs' Motion to Hold Third Parties Azure Technology Co., LTD, Zero DDOS LLC, and ClearDDOS Technologies in Contempt (the "Service Documents") were sent via certified mail to Azure Technology Co., LTD ("Azure Tech") at the following physical address associated with Azure Tech in public records: 1644 Sherman Street, Denver, Colorado, 80203. *See* ECF Dkt. 218-28; *see also* Certified Mail Receipt attached hereto as Exhibit 1. The Service Documents were returned to Davis Wright Tremaine LLP, with a notation that they were "returned to sender." *See* Exhibit 2.

3. On October 19, 2017, copies of the Service Documents were also sent to Azure Tech via email at the following email addresses associated with Azure Tech in public records or obtained through counsel's prior communications with Azure Tech: terry@azure-tech.com, abuse@azure-tech.com, and ts@azure-tech.com. Exhibit 3; ECF Dkt. 219. On the same day, a person signing as "Simon" and using the email address ts@azure-tech.com responded by email stating "We have been informed [sic] our Customer and dealing with it. Thanks for contacting us." Exhibit 4.

4. On October 17, 2017, copies of the Service Documents were sent via certified mail to ZERO DDOS LLC ("Zero DDOS") at the following physical addresses associated with Zero DDOS in public records: 530 W. 6th Street, Los Angeles, California; 5711 W. Kentucky Avenue, Lakewood, Colorado, 80202; and 115 S. Pikes Peak, Florence, Colorado, 81226. *See* ECF Dkt. 218-28; *see also*

1 Exhibit 1. The current resident of 5711 W. Kentucky Avenue, Lakewood, Colorado,
2 80202 informed Davis Wright Tremaine LLP that Zero DDOS was not located at that
3 address. No response has been received regarding the Service Documents sent to the
4 two other addresses.

5 5. On October 19, 2017, copies of the Service Documents were also sent to
6 Zero DDOS via email at the following email address associated with Zero DDOS in
7 public records or obtained through counsel's prior communications with Zero
8 DDOS: colin@zeroddos.com. Exhibit 5; ECF Dkt. 219. On the same day, a person
9 using the email address support@esited.com responded by email stating "We have
10 received your support request and will respond to it within 24 hours. However we
11 normally respond to most requests within a few hours." Exhibit 6.

12 6. On October 17, 2017, copies of the Service Documents were sent via
13 federal express to ClearDDOS Technologies ("Clear DDOS") at the following
14 physical addresses associated with Clear DDOS in public records: 215-5625 Senlac
15 Street, Vancouver, BC, V5R 6G8, Canada; and 14/F, Kowloon Building, 555 Nathan
16 Road, Mongkok, Kowloon, Hong Kong. *See* ECF Dkt. 218-28; *see also* Federal
17 Express Tracking Receipt attached hereto as Exhibit 7.

18 7. On October 19, 2017, copies of the Service Documents were also sent to
19 Clear DDOS via email at the following email addresses associated with Clear DDOS
20 in public records or obtained through counsel's prior communications with Clear
21 DDOS: cs@clear-ddos.com, support@clear-ddos.com, and herotm@gmail.com.
22 Exhibit 8; ECF Dkt. 219. On the same day, a person signing as "Simon" and using
23 the email address simon.gao@data99.com responded by email stating "We have been
24 informed [sic] our Customer and dealing with it. Thanks for contacting us." Exhibit
25 9.

26 I declare under penalty of perjury under the laws of the United States of
27 America that the foregoing is true and correct.

28 Executed this 13th day of November, 2017 in Los Angeles, California.

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/s/ Sean M. Sullivan
Sean M. Sullivan